

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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IN RE: Bair Hugger Forced Air Warming  
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates to

*All Cases*

**DEFENDANTS' UNOPPOSED  
MOTION FOR THE ISSUANCE OF  
A LETTER OF REQUEST FOR  
INTERNATIONAL JUDICIAL  
ASSISTANCE TO THE  
APPROPRIATE JUDICIAL  
AUTHORITIES IN THE UNITED  
KINGDOM**

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Pursuant to 28 U.S.C. § 1781(b)(2) and Federal Rule of Civil Procedure 28(b), Defendants 3M™ Company and Arizant Healthcare Inc. (“Defendants”) respectfully move the Court for an order issuing a letter of request for international judicial assistance to the Senior Master of the High Court of Justice, Queen’s Bench Division, Royal Courts of Justice, Strand, London WC2A 2LL. As set forth in the accompanying memorandum of law, Defendants seek assistance in obtaining testimony and documents from study authors David Leaper, Andrew Legg, Paul McGovern, and Mike Reed, each of whom is an author on certain scientific literature cited and relied upon in Plaintiffs’ Master Long-Form Complaint and thus who has unique information that is relevant to plaintiffs’ allegations. Because Defendants cannot obtain the information at issue by other means, they respectfully request that the Court grant this motion and issue the proposed Letter of Request submitted as Exhibit 1. Plaintiffs have agreed not to oppose this motion.

Dated: July 8, 2016

Respectfully submitted,

*s/Bridget M. Ahmann*

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